

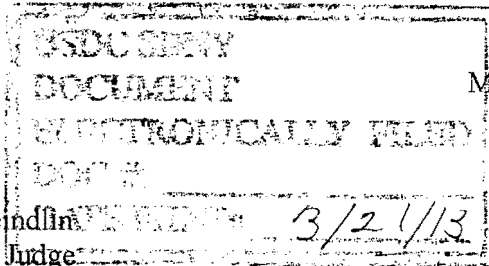
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March 21, 2013

**Via Hand Delivery**

Honorable Shira Scheindlin  
United States District Judge  
U.S. District Court  
Southern District of New York  
500 Pearl Street, Room 1620  
New York, NY 10007

Re: In re MTBE Products Liability Litigation/Commonwealth of  
Puerto Rico v. Shell Oil Co.  
MDL 1358(SAS), M21-88 – 07 Civ. 10470(SAS)

Dear Judge Scheindlin:

We respectfully submit the following in further support of our request for a 30-day extension as set forth in our March 19 letter and as a brief response to the letter of today's date from counsel for Plaintiff opposing our request.

We take issue with counsel's suggestion that we failed to inform the Court about matters material to our request. We most certainly advised the Court that a prior 30-day extension had been granted inasmuch as we stated in our prior letter that "Plaintiff's counsel, John Dema, initially agreed to extend the date for our clients to respond to the Complaint to March 22."

With respect to the merits and/or sustainability of the claims against our clients, we have had an ongoing dialogue with counsel for the express purpose of vetting with him the bases upon which the Trammo entities were considering a pre-answer motion to dismiss. We requested no less than four times in writing that counsel provide the documents upon which Plaintiff relied in naming the Trammo entities as defendants. Those requests were ignored and no documentation was provided.

In response to our request that the Court grant a further extension, counsel now has attached to his letter today -- with a response to the Third Amended Complaint due tomorrow --

Mound Cotton Wollan & Greengrass

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the documents that we requested last month. Had those documents (which apparently have at all times been readily available to Plaintiff and its counsel) been provided when first requested on February 19, and again requested in writing on March 7, March 13, and March 19 (See Exhibit 1), an additional extension might not have been necessary. We do, however, require time to now discuss this documentation and its potential implications with our clients.

Moreover, the likely affiant in support of any motion to dismiss is away on vacation until Monday, March 25, 2012, which complicates our ability to assess this documentation.

Accordingly, we respectfully request a 30-day extension of time in which to answer or otherwise move with respect to the Third Amended Complaint.

Respectfully submitted,



Mark S. Katz

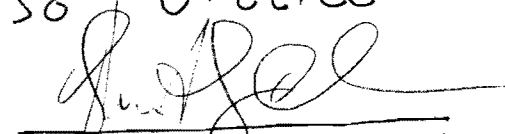
cc: **Via Facsimile and Email**

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Trammo Caribbean, Inc.  
and Trammo Petroleum, Inc.  
are hereby granted a twenty-one (21)  
day extension of time to answer or  
otherwise plead with respect to the Third  
Amended Complaint.

No further adjournment for any  
reason. A responsive pleading must be  
filed by April 12, 2013.

3/21/13

So Ordered  
  
Shira A. Scheindlin, USDJ